

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
_____	:	

DEFENDANT UNIVERSAL PROTECTION SERVICE, LP’S
MOTION FOR SANCTIONS

NOW COMES Defendant Universal Protection Service, LP, Inc.’s d/b/a Allied Universal Security Services. (“Allied” or “Defendant”), by and through its undersigned counsel, files this Motion for Sanctions against Plaintiff Twana Ahmed (“Ahmed” or “Plaintiff”). Defendant respectfully moves the Court to sanction Plaintiff for deliberate perjury committed against this Court, the Equal Employment Opportunity Commission, and Allied. As detailed in the accompanying Memorandum in Support (“Memorandum”), the record establishes that Plaintiff knowingly and repeatedly provided false sworn testimony throughout this litigation. For the reasons stated herein and in the Memorandum, Defendant respectfully requests that the Court grant this Motion, and dismiss Plaintiff’s Complaint with prejudice, and grant Defendant its attorney fees and costs.

Dated: August 13, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2025, I caused to be served a true and correct copy of the foregoing document on all counsel of record via electronic mail as follows:

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